

STATE OF INDIANA )  
 ) SS: LAKE \_\_\_\_\_ COURT  
COUNTY OF LAKE ) ROOM NUMBER \_\_\_\_\_  
 \_\_\_\_\_, INDIANA

DEBORAH GRIGGS, )  
 )  
Plaintiff, )  
 )  
vs. ) Cause No.:  
 )  
COSTCO WHOLESALE )  
CORPORATION, )  
 )  
Defendant. )

### COMPLAINT FOR DAMAGES AND JURY DEMAND

Comes now Plaintiff, Deborah Griggs, by counsel, Julie A. Dugan of Rubino, Ruman, Crosmer & Polen, and for her complaint against the Defendant, Costco Wholesale Corporation, states as follow:

1. On September 7, 2018,, Plaintiff, Deborah Griggs, was a business invitee on the premises of the Defendant located at 1310 E 79<sup>th</sup> Avenue, Merrillville, Lake County, Indiana.
2. That at said date and time, the Defendant had a duty to maintain the premises in a reasonably safe condition.
3. That at said date and place, the Defendant was negligent in maintaining, operating, inspecting and warning those on their premises so as to create an unsafe condition for Plaintiff, Deborah Griggs, and others similarly situated.
4. That as a direct and proximate result of the Defendant's fault and negligence, the Plaintiff was injured, some of which may be permanent, incurred



medical expenses, economic loss, and was otherwise damaged when she slipped and fell

on the wet floor inside the building owned by the Defendant.

WHEREFORE, Plaintiff demands judgment against the Defendant in an amount which will reasonably compensate her for her damages, cost, interest and any other just and proper relief.

s/ Julie A. Dugan  
Julie A. Dugan (Atty #22637-45)  
RUBINO, RUMAN, CROSMER & POLEN  
Attorney for Plaintiff

**JURY DEMAND**

Plaintiff, by counsel, demands trial by jury.

s/ Julie A. Dugan  
Julie A. Dugan (Atty #22637-45)  
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